

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Pringah Sodwah M.A. Payne's Etc.

Write the full name of each plaintiff.

20 CV 524  
(Include case number if one has been assigned)

-against-

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

MTA Police Officer Crocillo badge 2477  
MTA - MTA 34 Precinct @ 34 Street  
Penn Station on 7th Av.

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

**I. BASIS FOR JURISDICTION**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☐ Federal Question
- ☐ Diversity of Citizenship

**A. If you checked Federal Question**

Which of your federal constitutional or federal statutory rights have been violated?

*Constitutions: The Constitution gave me freedoms of Rights of religious  
free speech & Right to travel. When Police officer abusing their  
power its not Right or must put a stop onto it, yet MHA  
Hiring Racist Police officers that Margalized, Harass & Abuse  
individuals special blacks & Brown skins people couple rights.  
Police Brutalities*

**B. If you checked Diversity of Citizenship****1. Citizenship of the parties**

Of what State is each party a citizen?

The plaintiff, Fuzat Sodrol M/M. Pagnis Elmez is a citizen of the State of

(Plaintiff's name)

Florida & New York

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, MTA / MTA police officer Crocilla Page # 2477, is a citizen of the State of MTA  
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

MTA / MTA 34 street 7th AV precinct

If the defendant is a corporation:

The defendant, Officer Crocilla 2477, is incorporated under the laws of the State of \_\_\_\_\_

and has its principal place of business in the State of NYC

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in MTA

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Prayer Godiah  
 First Name

MM  
 Middle Initial

Prenday Payne's Club  
 Last Name

40 dnn street #2B  
 Street Address

NYC  
 County, City

NY  
 State

10038  
 Zip Code

(734) 999-7318 (212) 804-8688  
 Telephone Number

prenday.mc@gmail.com  
 Email Address (if available)

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 2:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 3:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

**III. STATEMENT OF CLAIM**

Place(s) of occurrence:

348 street Penn Station

Date(s) of occurrence:

January 8, 2020

**FACTS:**

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

I have my good friend Jenny whom work for Feb Cap cleaning the bathroom inside 348 street Penn Station between 11pm-7am. her father is dying from Cancer and she's been really depressed about the situation so I do my best to visit her whenever I can at work to try to give her some hope in this dark moment she's facing. Each time I go visit this one officer always harassed me inside the Penn Station whenever he see me the first time was attack by officer Crocilla was July 2019 he pick my wheelchair from the back left it dropped it very hard hard up in the hospital & filed complaint nothing was done. So I continue visit my friend & always look at for this harasser bullying bullied I have video of him & his co-workers harassing me inside Penn Station telly me that should talk a not talk. On January 8, 2020 after spoke to Jenny on January 7, 2020 about me bring a gift to her to give it to her father for me since he resign in PA she told me after work I was going to visit her she agree for me to bring to gift to her to give to her father for me. so on January 8, 2020 when I got off the bus I saw officer Crocilla & his co-workers smoking in front of the



Elevator I pulled out my phone start recording then I passed them the hallway smell like old white men cigars. I made my way downstairs to the bathroom inside the Penn Station to visit Jenny me a Jenny spoke I save her the first she was running late for work so I left her say goodbye. As I turn the corner officer Crocilla used his police card turns the headlight blinking in my eyes I have history of Seizure alone. Could caused me to go to Seizure, my Specs couldn't see rights so I park my wheelchair in the corner trying to turn my phone on so I could record him officer Crocilla passed by grab bed me on my tight I pushed his hand i. Start screaming for help people was lucky he drove off turns back around grab my hands told him I'm a muslim do not touch me he told me "I don't give a fuck about your religion" he called another officer often they hand left me push my head against the wall, drove my wheelchair so fast back

#### INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

trying to hold on not to fall. got inside in the elevator officer Crocilla tried to grab my purse that was wrapped around me when he couldn't he threw me out of my wheelchair kick me several times on my Right side with his left foot, put his foot on my Chest cut my purse that was wrapped around me, dragged me out of the elevator on the floor outside MTA 34th entrance have his foot on my Chest Called 911 have me put into psych when I told the people @ Bellevue Hospital

#### IV. RELIEF

State briefly what money damages or other relief you want the court to order.

pend me to medical my wrist was bleeding from the handcuff was tight & they made sure I sat on it when the ambulance 2 white men came they all was laughing at me the ambulance guys ask me how did I hand up on the floor out of the wheelchair I told him to drag me into the stretcher to try to put me to psych, psych told them I don't belong here I don't psych history they kept me to medical to be treated then transfer me to knox hill because I have a heart device on my chest they want knox hill that monitor the device to make sure they took care of it. oh ps I have to have the battery replace because I have a tech battery my PCP is working on with the insurance i Card. to get it done for my Revisions Right a Free dem was violated I'm ASRP over billions

When I was going to the hospital  
 ambulance for them to try to put me to  
 psych the Sargeant came with three  
 other officers was screaming for help  
 while all other bunch of white people  
 passing by staring no one helps or  
 stand up for me as a lone white  
 female. the Sargeant told me to  
 "Shut the Fuck up before he pull  
 out his dick put it in my mouth  
 to shut me up." after he said that  
 they all where laughing like its  
 funny or a joke I was violent  
 my Religion was Violent, I was attacked  
 by 2 white men work as police officer for  
 MTA, while was inside the elevator the other  
 officer whom was with officer Crocilla told  
 me I Can Rap you no one will know it will  
 be your words : against ours, officer Crocilla  
 said I know how where she resign I have her  
 Informations I can go and rape her as much as  
 I want and I can bill her I can get away with  
 it I have been in the force for many years now  
 I can get away with it. officer Crocilla took my  
 Insurance Card, Passport SS card, size of man book that I have my  
 Bank statements inside of the pages is a yellow

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

1/17/2020  
Dated

*Prudh Godiah*  
Plaintiff's Signature

*Prudh* *Godiah* *Prudh*  
First Name Middle Initial Last Name

*40 Ann Street*  
Street Address

*NYC* *NYC* *10038*  
County, City State Zip Code

*(752) 999-7318*  
Telephone Number

*Prudh.godiah@yahoo.com*  
Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.



